

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

STATE OF MISSOURI,  
STATE OF NEBRASKA,  
STATE OF ALASKA,  
STATE OF ARKANSAS,  
STATE OF IOWA,  
STATE OF MONTANA,  
STATE OF NEW HAMPSHIRE,  
STATE OF NORTH DAKOTA,  
STATE OF SOUTH DAKOTA,  
STATE OF WYOMING,

No. 4:21-cv-01300-DDN

*Plaintiffs,*

v.

JOSEPH R. BIDEN, et al.,

*Defendants.*

---

**PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

## MOTION FOR A PRELIMINARY INJUNCTION

The States of Missouri, Nebraska, Alaska, Arkansas, Iowa, Montana, New Hampshire, North Dakota, South Dakota, and Wyoming (the Plaintiff States) respectfully request that the Court issue a preliminary injunction enjoining Defendants from requiring any federal contractor or subcontractor to comply, pursuant to Executive Order 14042 or any similar order, with the Safer Federal Workforce Task Force's *Covid-19 Workplace Safety: Guidance for Federal Contractors and Subcontractors* or any similar requirement issued by the Safer Federal Workforce Task Force, the Office of Management and Budget, and/or the Federal Acquisition Regulatory Council.

The Plaintiff States incorporate by reference the arguments in its Memorandum in Support of this Motion, filed contemporaneously herewith.

Because the Defendants' vaccine mandate requires all employees of federal contractors to be vaccinated by December 8, 2021, that would require employees to receive their vaccine shot by November 24, 2021. Plaintiff States therefore request a ruling by **November 24, 2021**.

Dated: November 4, 2021

**DOUGLAS J. PETERSON**  
**Attorney General of Nebraska**

/s/ James A. Campbell  
James A. Campbell\*  
*Solicitor General of Nebraska*  
Office of the Nebraska Attorney General  
2115 State Capitol  
Lincoln, NE 68509  
(402) 471-2686  
Jim.Campbell@nebraska.gov  
*Counsel for Plaintiffs*

Respectfully submitted,

**ERIC S. SCHMITT**  
**Attorney General of Missouri**

/s/ Justin D. Smith  
Justin D. Smith, #63253MO  
*Deputy Attorney General of Missouri*  
Michael E. Talent, #322220CA  
*Deputy Solicitor General*  
Missouri Attorney General's Office  
Post Office Box 899  
Jefferson City, MO 65102  
(573) 751-0304  
Justin.Smith@ago.mo.gov  
*Counsel for Plaintiffs*

\*Admission application forthcoming

**TREG R. TAYLOR**  
**Attorney General of Alaska**

/s/ Cori Mills

Cori M. Mills

*Deputy Attorney General of Alaska*

Alaska Department of Law  
1031 W. 4th Avenue, Suite 200  
Anchorage, AK 99501-1994  
(907) 269-5100  
Cori.Mills@alaska.gov  
*Counsel for State of Alaska*

**LESLIE RUTLEDGE**  
**Arkansas Attorney General**

/s/ Vincent M. Wagner

Vincent M. Wagner  
Deputy Solicitor General  
Office of the Arkansas Attorney General  
323 Center Street, Suite 200  
Little Rock, Arkansas 72201  
(501) 682-8090  
vincent.wagner@arkansasag.gov

JEFFREY S. THOMPSON  
Solicitor General

SAMUEL P. LANGHOLZ  
Assistant Solicitor General  
Office of the Iowa Attorney General  
1305 E. Walnut Street  
Des Moines, Iowa 50319  
(515) 281-5164  
(515) 281-4209 (fax)  
jeffrey.thompson@ag.iowa.gov  
sam.langholz@ag.iowa.gov  
*Counsel for State of Iowa*

**AUSTIN KNUDSEN**  
**Attorney General of Montana**

KRISTIN HANSEN  
Lieutenant General  
DAVID M.S. DEWHIRST  
Solicitor General  
CHRISTIAN B. CORRIGAN  
Assistant Solicitor General  
Office of the Attorney General  
215 North Sanders  
P.O. Box 201401  
Helena, MT 59620-1401  
406-444-2026  
[David.Dewhirst@mt.gov](mailto:David.Dewhirst@mt.gov)  
[Christian.Corrigan@mt.gov](mailto:Christian.Corrigan@mt.gov)  
*Counsel for State of Montana*

**JOHN M. FORMELLA**  
**New Hampshire Attorney General**

/s/ Anthony J. Galdieri  
Anthony J. Galdieri  
Solicitor General  
NEW HAMPSHIRE DEPARTMENT OF JUSTICE  
33 Capitol Street  
Concord, NH 03301  
Tel: (603) 271-3658  
[Anthony.J.Galdieri@doj.nh.gov](mailto:Anthony.J.Galdieri@doj.nh.gov)  
*Counsel for State of New Hampshire*

**WAYNE STENEHJEM**  
**Attorney General of North Dakota**

/s/ Matthew A. Sagsveen  
Matthew A. Sagsveen  
Solicitor General  
State Bar ID No. 05613  
Office of Attorney General  
500 North 9th Street  
Bismarck, ND 58501-4509  
Telephone (701) 328-3640  
Facsimile (701) 328-4300  
[masagsve@nd.gov](mailto:masagsve@nd.gov)  
*Counsel for State of North Dakota*

**JASON R. RAVNSBORG**  
**South Dakota Attorney General**  
/s/ David M. McVey  
David M. McVey  
Assistant Attorney General  
1302 E. Highway 14, Suite 1  
Pierre, SD 57501-8501  
Phone: 605-773-3215  
E-Mail: [david.mcvey@state.sd.us](mailto:david.mcvey@state.sd.us)  
*Counsel for State of South Dakota*

**BRIDGET HILL**  
**Wyoming Attorney General**  
/s/ Ryan Schelhaas  
Ryan Schelhaas  
Chief Deputy Attorney General  
Wyoming Attorney General's Office  
109 State Capitol  
Cheyenne, WY 82002  
Telephone: (307) 777-5786  
[ryan.schelhaas@wyo.gov](mailto:ryan.schelhaas@wyo.gov)  
*Attorneys for the State of Wyoming*

**CERTIFICATE OF SERVICE**

I hereby certify that, on November 4, 2021, a true and correct copy of the foregoing and any attachments were filed electronically through the Court's CM/ECF system, to be served on counsel for all parties by operation of the Court's electronic filing system and to be served on those parties that have not appeared who will be served in accordance with the Federal Rules of Civil Procedure by mail or other means agreed to by the party.

/s/ Justin D. Smith